# FOOD AND DRUG ADMINISTRATION CENTER FOR BIOLOGICS EVALUATION AND RESEARCH VACCINES AND RELATED BIOLOGICAL PRODUCTS ADVISORY COMMITTEE

Open Session

Thursday, August 7, 1997

Room 121, Building 29 National Institutes of Health 9000 Rockville Pike Bethesda, Maryland

# IN ATTENDANCE:

# Members

Patricia L. Ferrieri, M.D., Chair Professor, Departments of Laboratory Medicine and Pathology and Pediatrics Director, Clinical Microbiology Laboratory University of Minnesota Medical School 420 Delaware Street, S.E. Minneapolis, Minnesota 55455

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Kathryn M. Edwards, M.D. Professor of Pediatrics Department of Pediatrics Vanderbilt University School of Medicine D-7221 Medical Center North Nashville, Tennessee 37232

### IN ATTENDANCE (Continued):

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### **Temporary Voting Member**

Diane E. Griffin, M.D., Ph.D. Chair, Department of Immunology and Infectious Diseases Johns Hopkins University 615 North Wolfe Street Baltimore, Maryland 21205

### **Executive Secretary**

Nancy Cherry

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Call to Order

Dr. Patricia L. Ferrieri Chair

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Announcements

| Nancy Cherry        |  |
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| Executive Secretary |  |

# Introduction to the Program

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| I  | PROCEEDINGS (12:36 p.m.)                                    |
|----|---|
| 2  | DR. FERRIERI: I'd like to open the session.                 |
| 3  | I'm Pat Ferrieri, the chairperson of the Vaccines and       |
| 4  | Related Biological Products Advisory Committee. I would     |
| 5  | like to thank everyone, including our noisemaker, for       |
| 6  | joining us this morning. Just ignore it. We appreciate      |
| 7  | very much that the site visit took place, and our thanks to |
| 8  | Dr. Griffin and Dr. Lemon and others who conducted the site |
| 9  | visit for us.   |
| 10 | I would like to start, if we could, by                      |
| 11 | announcements from Mrs. Cherry.                             |
| 12 | MS. CHERRY: Yes, I have announcements. First                |
| 13 | of all, because this is a teleconference and it is being    |
| 14 | recorded, we will have a transcript from it, and we ask     |
| 15 | that you announce your name before you speak each time.     |
| 16 | If you get cut off from this teleconference,                |
| 17 | the number to dial is 1-800-545-4387 to be reconnected.     |

You should ask for Conference Number R38841.

- DR. FERRIERI: Can you repeat that, please? I
- 20 didn't have a pencil at the time.
- 21 MS. CHERRY: 1-800-545-4387.
- 22 DR. FERRIERI: 4387?
- 23 MS. CHERRY: 4387, and ask for R38841.
- DR. FERRIERI: Three what 41? It's 38841,
- 25 38841?

- 1 MS. CHERRY: Yes, two eights.
- 2 Today, we'll have a short open session, and
- 3 then we'll take a very short break to close the room for
- 4 the committee deliberations after that.
- 5 Then I will read the meeting statement. This
- 6 announcement is made a part of the record at this meeting
- 7 of the Vaccines and Related Biological Products Advisory

- 8 Committee on August 7th, 1997. Pursuant to the authority
- 9 granted under the committee charter, the director of the
- 10 Center for Biologics Evaluation and Research has appointed
- 11 the following individuals as temporary voting members:
- 12 Drs. Diane Griffin and Stanley Lemon. I will add that,
- 13 unfortunately, Dr. Lemon had a last-minute situation and
- 14 could not be with us today.
- Based on the agenda made available, it has been
- 16 determined that all committee discussions at this meeting
- 17 for the review of the intramural research program for the
- 18 Laboratory of Method Development, Division of Product
- 19 Quality Control, present no potential for a conflict of
- 20 interest. In the event that the discussions involve
- 21 specific products or firms not on the agenda, for which
- 22 FDA's participants have a financial interest, the
- 23 participants are aware of the need to exclude themselves
- 24 from such involvement, and their exclusion will be noted
- 25 for the public record.

- 1 With respect to all other meeting participants,
- 2 we ask in the interest of fairness that they address any
- 3 current or previous financial involvement with any firms
- 4 whose products they wish to comment on.
- With that, I will return the meeting to our
- 6 chair.
- 7 DR. FERRIERI: Nancy, I think that you need to
- 8 call the operator and see if she can cut off the people who
- 9 are on hold who are not on line with us yet, because we
- will not be able to hear anything.
- 11 MS. CHERRY: Well, Denise has gone to do that.
- DR. FERRIERI: Thank you.
- Dr. Edwards, are you here yet? Dr. Adimora?
- 14 (No response.)
- DR. FERRIERI: It appears that they are not.
- We'll move ahead with the introduction to the
- 17 program by Neil Goldman, who is associate director for
- 18 research at CBER.
- MS. CHERRY: The operator may come through, by

- 20 the way.
- DR. FERRIERI: Thank you, Nancy.
- Following him, we'll have Dr. Edward
- 23 Fitzgerald, and Dr. David Asher following that.
- I'd like to remind everyone to stay strictly on
- 25 the schedule that Nancy has provided for us, so that we can

- deal with our deliberations. If we don't have a quorum or
- 2 if I have to drop out because we go overtime, then we'll
- 3 have to start this all over again.
- 4 Dr. Goldman, are you there?
- 5 DR. GOLDMAN: I'm here.
- 6 DR. FERRIERI: Good morning.
- 7 DR. GOLDMAN: Good morning. How are you?
- 8 Well, I should say good afternoon to all, and I

- 9 also would like to thank you all for participating in this
- 10 teleconference to review the results of the site visit for
- 11 the Laboratory of Method Development. As you are aware
- 12 already, the role of our product advisory committees is
- 13 multifaceted and includes technical advice on biological
- 14 products, classes, or groups of products; advice on
- 15 appropriate design of clinical trials; advice on the use of
- 16 surrogate markers --
- MS. CHERRY: Can we stop here? Is that the
- 18 operator trying to get through?
- DR. FERRIERI: I don't know.
- 20 PARTICIPANT: It's virtually unhearable.
- DR. FERRIERI: That's right. I mean, you might
- as well not be talking.
- MS. CHERRY: I'm going to turn the volume up a
- 24 little bit.
- DR. FERRIERI: That won't help. Why do we have

- 1 a lull in the beeping right now?
- 2 MS. CHERRY: Well, maybe the operator was able
- 3 to stop it. Maybe that's what that was.
- 4 DR. FERRIERI: It's stopped. If we could maybe
- 5 resume, Dr. Goldman, and we'll test it.
- 6 DR. GOLDMAN: Sure.
- 7 If I may, as you're aware already, the role of
- 8 our product advisory committees is multifaceted and it
- 9 includes technical advice on biological products, classes,
- 10 or groups of products; advice on appropriate design of
- 11 clinical trials; advice on the use of surrogate markers for
- 12 clinical endpoints; advice on interpretation of the results
- 13 of clinical protocols; advice on risk assessment; and
- 14 lastly, peer review of our intramural research programs and
- 15 the research scientists who participate in them. While
- 16 academicians usually are reviewed each time they submit and
- 17 obtain a grant, our laboratories, which are funded
- 18 intramurally, are reviewed every four years by a subgroup
- 19 of you, our advisory committee. This mechanism is similar
- 20 to the periodic lab review at NIH carried out by their

- 21 Boards of Scientific Counselors.
- Historically, research has been an integral
- 23 part of the mission of CBER, which is to protect and
- 24 enhance the public health through regulation of biological
- and related products, including blood, vaccines, and

- 1 biological therapeutics according to statutory authority.
- 2 The regulation of these products is founded on science and
- 3 law to ensure their purity, potency, safety, efficacy, and
- 4 availability. To fulfill this mission, we conduct research
- 5 as an essential element of science-based decisionmaking on
- 6 regulatory issues.
- 7 Uniquely among the other centers of FDA, we
- 8 were mandated in 1955 by a PHS order that we "shall conduct
- 9 research on problems related to vaccines, serums,

- 10 antitoxins, and analogous products, including blood and its
- 11 derivatives." We "shall conduct other studies to assure
- safety, purity, and potency of biological products, to
- 13 improve existing products, and to develop new products."
- 14 This certainly would naturally extend to research to
- 15 improve the techniques to assure the safety of existing
- 16 products, as you will hear today.
- 17 As you already know, under the current
- 18 administrative structure of CBER there are seven offices.
- 19 Within each office, there are divisions composed of both
- 20 laboratory-based and nonlaboratory-based scientists.
- 21 Lab-based research is carried out in divisions within four
- 22 offices: the Office of Vaccines, Office of Blood, Office
- 23 of Therapeutics, and Office of Establishment Licensing and
- 24 Product Surveillance. The Laboratory of Method
- 25 Development, whose site visit you will be considering

- 1 today, resides in the Office of Establishment Licensing and
- 2 Product Surveillance and within the Division of Product
- 3 Quality Control.
- 4 We also have full-time regulatory scientists in
- 5 application divisions within each of the four offices,
- 6 which include clinical reviewers, pharmacologists and
- 7 toxicologists, statisticians, and epidemiologists. Some of
- 8 these staff -- for example, the statisticians and
- 9 epidemiologists -- may carry out nonlab-based research.
- In terms of logistics, the Center has about 400
- 11 lab-based scientists, of which there are approximately 85
- 12 who are principle investigators with permanent career
- 13 appointments, and there are about another 85 who are what
- 14 we refer to as conversion-track investigators, but may be
- 15 more familiar to you as tenure track. These temporary
- 16 employees, in this latter category, fall within our Service
- 17 Fellowship Program, and they are commonly referred to as
- 18 staff fellows.
- In CBER, we have been operating under the
- 20 researcher/reviewer model in which all researchers are
- 21 fully integrated into the review process. Their regulatory

- 23 and presentation of regulatory policy; meeting with
- 24 manufacturers, sponsors, and advisory committees; and they
- 25 also perform annual and prelicense inspections. The

- 1 percentage of time spent on regulatory responsibilities is
- 2 usually commensurate with the length of time they have been
- 3 with us and their employment status, and can vary from 10
- 4 to 50 percent.
- 5 The types of research which are considered
- 6 mission-related include research on specific products that
- 7 are under an active IND or license application; research on
- 8 a specific policy issue related to a product or product
- 9 class, disease area, or therapeutic modality to provide the
- 10 foundation for evaluating future INDs and license

- 11 applications that will be submitted; and research
- 12 associated with the development of methods and standards to
- which products can be compared. This latter category is
- 14 very apropos to the research being carried out in the
- 15 Laboratory of Method Development.
- The request to you, the Vaccines and Related
- 17 Biological Products Advisory Committee, as was originally
- 18 related to the site visit team, chaired by Dr. Griffin --
- 19 with our thanks -- is to assess, considering both the
- 20 strengths and weaknesses, the quality and appropriateness
- 21 to the regulatory mission of the research being conducted,
- 22 which includes the relevance, originality, creativity and
- 23 level of sophistication, and also to evaluate the
- 24 accomplishments of the individual scientist, which includes
- 25 demonstration of independence, productivity, validity of

- 1 approaches, and research stature.
- In addition, we have asked the site visit team,
- 3 and thus through them this full advisory committee as well,
- 4 to provide advice on the current scientific direction of a
- 5 research program, whether new directions should be
- 6 considered, any changes in the way a research program is
- 7 administered or the level and utilization of resources, and
- 8 lastly and very importantly, we asked for any advice on
- 9 promotion or conversion -- that may be conversion to a
- 10 senior investigator position, which is an independent
- 11 investigator position, or staff scientist position, which
- 12 is a dependent investigator position -- of some of our
- designated personnel. For example, we'd be interested in
- 14 appropriateness of this action at this time.
- Ultimately, the final report of the site visit
- 16 team which is approved by this full advisory committee will
- 17 be sent to the Center director, Dr. Zoon, who will pass it
- 18 on to the appropriate office and division director, and
- 19 finally down to the lab chief and the investigator who was
- 20 reviewed. Any responses to comments in the final report
- 21 will be prepared, and these responses will be forwarded
- 22 back to this advisory committee.

- 24 peer review of our research programs and the scientists who
- 25 participate in them, is a critical tool for us to use to

- 1 effectively manage the research programs in the Center as
- 2 well as to aid us in making important personnel decisions.
- 3 The need for a comprehensive in-depth evaluation is
- 4 especially true in times of reduced resources when
- 5 stringent research priorities must be set.
- I now would like to turn this back to the
- 7 chair, Dr. Ferrieri, who will be introducing Dr.
- 8 Fitzgerald, the director of the Division of Product Quality
- 9 Control, who will relay to you a more targeted view of the
- 10 programmatic needs of his division and how the Laboratory
- 11 of Method Development and their research programs fit into

- 12 the mission and address the needs of this division. I'd
- 13 also like to thank the chair for the opportunity to speak
- 14 to you today.
- DR. FERRIERI: Thank you very much, Dr.
- 16 Goldman, for such a succinct overview.
- We'll proceed, then, with Dr. Fitzgerald. If
- 18 there is any background noise you are hearing due to your
- 19 own environment, I wonder if you could turn it down. I
- 20 hear voices in the background. Maybe many of the others do
- 21 as well. Either that or I'm having auditory
- 22 hallucinations.
- 23 (Laughter.)
- DR. FERRIERI: I hope it's not the case.
- So the overview of the Division of Product

- 1 Quality Control will be presented by Dr. Edward Fitzgerald.
- 2 DR. FITZGERALD: Yes, good afternoon. Thank
- 3 you very much. I would like to give a brief overview of
- 4 the Division of Product Quality Control and then let Dr.
- 5 David Asher discuss the Laboratory of Method Development
- 6 more extensively.
- 7 The division consists of three laboratories --
- 8 the Laboratory of Standards and Testing, the Laboratory of
- 9 Analytical Chemistry, and the Laboratory of Method
- 10 Development -- and one administrative group, which is known
- 11 as the Product Release Branch. This latter group has
- 12 responsibility for the lot-by-lot release program for
- 13 biological products.
- 14 At the site visit, we handed out a functional
- 15 mission statement for DPQC. Unfortunately, that was not
- sent to you as a part of your package, so what I would like
- 17 to do is to summarize the mission statement very briefly
- 18 before turning this over to Dr. Asher.
- 19 First, our division performs quality control
- 20 assays on biological products that are submitted for
- 21 release action by the Center or for licensing actions.
- 22 This testing occurs principally in the Laboratory of
- 23 Standards and Testing and in the Laboratory of Analytical

- 24 Chemistry, but LMD is also now performing the MAPREC assay
- on a monovalent oral polio vaccine in parallel with the

- 1 monkey neurovirulence test. So this is then considered to
- 2 be regulatory testing.
- 3 Second, we establish and provide the official
- 4 U.S. reference and standard preparations that are used for
- 5 the quality control tests performed by the manufacturers of
- 6 these products, and also by our own laboratories here in
- 7 the Center. This occurs in the Laboratory of Standards and
- 8 Testing and we also have a clean room, a filling room, and
- 9 a freeze drier, which we use to make these preparations.
- Also, we coordinate the lot release program in
- 11 the Center that I mentioned before in the Product Release
- 12 Branch. As most of know, many of our biological products

- are sent to CBER for review and testing before they are
- 14 released for distribution by the manufacturer.
- 15 All three laboratories are pursuing an active
- 16 applied research program that is focused on quality control
- 17 testing, with our main goals being improvement of the test
- 18 or development of a new test, with replacement of animals
- 19 as our goal wherever possible. We have 21 active research
- 20 projects in the division and the projects in the Laboratory
- 21 of Method Development are among our most complex and our
- 22 most highly visible.
- Finally, as Dr. Goldman mentioned, all of our
- 24 scientists participate in the regulatory review process for
- 25 biological products, reviewing regulatory documents,

- 2 hoc licensing committees.
- Now, I would like to turn this over to Dr.
- 4 David Asher, the chief for the Laboratory of Method
- 5 Development, for a more extensive overview of that
- 6 laboratory.
- 7 DR. FERRIERI: Thank you, Dr. Fitzgerald.
- 8 Dr. Asher?
- 9 DR. ASHER: Thank you, Dr. Ferrieri, Dr.
- 10 Griffin.
- Research in the Laboratory of Method
- 12 Development is intended to improve regulatory testing of
- 13 biologics, making tests more predictive, reliable,
- 14 economical, and accessible, and to replace the use of
- animals, especially primates, whenever possible.
- On February 21st, the laboratory presented for
- 17 review six current projects. The professional staff under
- 18 review included five investigators, three with permanent
- 19 positions and one previously approved by the Center
- 20 director for a permanent position when he becomes a
- 21 citizen. The fifth investigator is now proposed for
- 22 conversion to a tenured position. Each of the six projects
- 23 is a cooperative effort led by one of those five people,
- 24 but involving others. Three visiting professionals and

- 1 participate.
- 2 The first three projects, each aimed at
- 3 replacing the monkey neurovirulence test for safety and
- 4 consistency of live oral poliovirus vaccine, began under
- 5 the direction of Dr. lnessa Levenbook, retired chief of the
- 6 laboratory. Two are collaborative studies in support of
- 7 the World Health Organization's Campaign for the Global
- 8 Eradication of Poliomyelitis. WHO's Global Program on
- 9 Vaccines and Immunization identifies development of
- 10 alternative models for investigation of attenuation and
- 11 safety testing of OPV as a research priority. LMD serves
- 12 as a WHO focal-point laboratory in those efforts.
- The first project is MAPREC -- mutant analysis

- 14 by PCR and restriction enzyme cleavage -- a rapid and
- 15 sensitive method for quantifying the small amounts of
- 16 mutant nucleotides normally present in a viral
- 17 quasispecies. Dr. Konstantin Chumakov's work confirmed the
- 18 concept that there is a threshold for the content of
- 19 potentially virulent mutants in OPV, and if the amount of
- 20 mutant remains below that threshold, the vaccine is still
- 21 fully attenuated. For regulatory purposes, he validated
- 22 the ability of MAPREC to identify those lots of type 3 OPV
- 23 that failed monkey tests. He has moved MAPREC from
- 24 candidate WHO test for safety of type 3 OPV to what we
- 25 anticipate will soon be accepted by WHO as a supplementary

- 19
- 1 or alternative test. During the past two years, Dr.
- 2 Chumakov has guided all molecular biological aspects of the

- 3 WHO study, preparing candidate reference DNA and other
- 4 standards needed to control the test and helping other
- 5 participants to establish it in their own institutions.
- 6 In recent efforts to develop the test for type
- 7 2 OPV, Dr. Chumakov has determined a probable virulence
- 8 threshold for content of mutant 481-G and he is
- 9 investigating the possible contribution of two other
- 10 mutants, 3363-G and 3364-A, to its virulence. A MAPREC for
- 11 type 2 OPV may have to quantify mutant nucleotides at all
- 12 three locations.
- 13 Establishing MAPREC for type 1 OPV has,
- 14 paradoxically, been complicated by the fact that it is very
- stable, and no available lots of type 1 vaccine have
- 16 convincingly failed monkey tests. However, tests of
- 17 experimental preparations suggest that mutations 480-G plus
- 18 525-C, which are adjacent nucleotides across a stem loop in
- 19 the 5-prime noncoding regions, are virulent, and no other
- 20 suspicious mutants have been identified.
- 21 MAPREC has already been used by manufacturers
- 22 as a screening test to reduce reliance on monkeys when
- 23 establishing production, changing viral seeds, or altering
- 24 conditions of production of OPV.
- 25 MAPREC should be applicable to regulatory

- 1 control of other live viral vaccines, vaccines for which,
- 2 even if virulent mutations have not been identified,
- 3 typical profiles of mutations that appear during production
- 4 can be determined and monitored for consistency. We
- 5 obtained outside funding for such studies, and anticipate
- 6 beginning with mumps and yellow fever vaccines, to be
- 7 followed by measles, rubella, and varicella vaccines, as
- 8 well as several investigational live viral vaccines. We
- 9 recently began a collaborative effort with the Argonne
- 10 National Laboratory to develop a promising gel-microchip
- 11 technology that we hope will detect mutants -- perhaps not
- 12 as sensitively as MAPREC, and we plan to determine that --
- in vaccines as well as adventitious agents.
- 14 Project 2, also initiated under Dr. Levenbook,

- and led by Dr. Jeanette Ridge, is an attempt to develop a
- 16 surrogate test in interferon-treated neuronal cell cultures
- 17 predictive of the monkey neurovirulence of type 3 OPV. The
- 18 study was based on the observation that yields of type 3
- 19 OPV propagated in SY5Y human neural cells were more
- 20 inhibited by treatment of the cells with gamma interferon
- 21 than were yields of a virulent vaccine revertant or
- 22 wild-type virus. In repeated experiments, those
- 23 differences, although variable in magnitude, were
- 24 consistently observed and statistically significant.
- 25 However, the assays are time-consuming, and their

- 1 predictive power for various lots of type 3 OPV and for
- 2 other types of OPV remains undetermined.
- 3 Given that the two WHO-supported tests intended

- 4 to replace monkey testing are better developed and
- 5 considering that global eradication of poliomyelitis is
- 6 expected within three years, we have decided to complete
- 7 only those additional experiments needed to describe the
- 8 basic phenomenon -- measuring interferon-induced yield
- 9 reductions for vaccines selected from Projects 1 and 3. As
- 10 a new project, part of Project 6, Dr. Ridge has begun
- 11 efforts to propagate and characterize a cell culture
- 12 reported to support growth of some strains of the scrapie
- 13 agent.
- In Project 3, Dr. Eugenia Dragunsky has almost
- 15 completed her projected goals for establishing a
- 16 neurovirulence test for type 3 OPV in transgenic mice using
- 17 the TgPVR21 line expressing the human poliovirus receptor
- 18 gene, provided by our collaborator, Dr. Tatsuji Nomura, as
- 19 a possible replacement for monkeys. Dr. Dragunsky
- 20 perfected and instructed collaborating investigators in the
- 21 delicate technique of intraspinal injection of mice needed
- 22 to discriminate between attenuated and virulent
- 23 preparations of type 3 OPV. The technique successfully
- 24 identified all lots of vaccine failing the standard WHO
- 25 monkey neurovirulence test, even so-called "marginal" lots

- with only slightly elevated contents of the 472-C mutant,
- 2 without rejecting any vaccine that passed the monkey test.
- 3 Five other laboratories in the WHO study have now achieved
- 4 a similar result with vaccines selected by Dr. Dragunsky.
- 5 Dr. Dragunsky has demonstrated promising
- 6 results for type 2 OPV, successfully detecting several
- 7 vaccine lots that failed monkey tests. One type 2 vaccine
- 8 that several times passed monkey tests failed the mouse
- 9 test, and possible contributions of mutants outside the 5-
- 10 prime noncoding nontranslated region of the viral genome
- 11 that I mentioned in Project 1 are under study now.
- Production lots of type 1 OPV have, of course,
- 13 not failed monkey tests, but nonetheless we have attempted
- 14 to develop a mouse test for that type. At the time of the
- 15 site visit, TgPVR21 mice had not successfully discriminated

- 16 experimental preparations of type 1 vaccine containing
- 17 increased amounts of mutations at complementary nucleotides
- 18 480 and 525. However, recent experiments, using reduced
- 19 infecting doses of virus, 10 to 100 TCID50, successfully
- 20 discriminated a preparation containing 9 percent of those
- 21 mutations from WHO type 1 reference vaccine containing 0.5
- 22 percent. We will attempt to improve the discriminatory
- 23 ability of our test for type 1 OPV by increasing numbers of
- 24 animals and selecting an optimal infecting dose of virus,
- as we did for type 3.

- 1 Project 4, Validation of Candidate Assays
- 2 Intended to Replace the Monkey Neurovirulence Test of Live
- 3 OPV and Development of Suitable Regulatory Tests, is one
- 4 project that I initiated as a separate new project. It

- 5 seemed to me that each of the three previous projects
- 6 shared common features and that each required similar
- 7 methodological evaluation -- to optimize numbers of
- 8 replicate samples in a test, to standardize viral
- 9 infectivity titrations and other controls for the tests,
- and to specify validation criteria suitable for a
- 11 regulatory assay and decision criteria for determining
- 12 whether a test vaccine should be accepted or not. It
- 13 seemed to me that such research should be a project in its
- 14 own right, because its general statistical approach clearly
- 15 applied not just to testing of OPV or other vaccines, but
- 16 also to regulatory testing in general.
- 17 Since Rolf Taffs was doing a fine job in
- 18 providing skilled, meticulous, and enthusiastic statistical
- 19 support for Projects 1 and 3, he seemed to me to be an
- 20 ideal person to lead this project. Dr. Taffs' analyses
- 21 recently, in consultation with Drs. Henry Hsu and Peter
- 22 Lachenbruch of our Division of Biostatistics and
- 23 Epidemiology, have had practical importance guiding
- 24 development of the decision models for both MAPREC and Tg
- 25 mouse tests to be proposed to the WHO at a consultation of

- 1 the Global Program on Vaccines and Immunization next month.
- 2 Dr. Taffs will propose validation criteria for
- 3 the mouse test based on historical mean rates of paralysis
- 4 and mortality in groups of 30 gender-balanced mice injected
- 5 with selected doses of reference vaccine and an innovative
- 6 decision model based on the odds ratio for scores of
- 7 clinical severity in mice injected with test vaccine
- 8 compared with those injected with reference vaccine. He
- 9 has also prepared other, more traditional, decision models
- 10 as alternative possibilities.
- Dr. Taffs has recently addressed relevant
- 12 aspects of tests to evaluate removal of spongiform
- 13 encephalopathy agents from production of FDA-regulated
- 14 products.
- 15 THE OPERATOR: Hello. Ms. Nancy Cherry?
- MS. CHERRY: Yes?

- 17 THE OPERATOR: I'm sorry. This is the
- 18 operator. I have the party on the line who wants me to add
- 19 them, Ms. Kathryn Edwards, who is not on the list.
- MS. CHERRY: She should be on your list.
- THE OPERATOR: I don't show her on the list.
- 22 Would you like for me to --
- MS. CHERRY: She is the next to the last name
- 24 on your list.
- 25 THE OPERATOR: The next to the last name,

- 1 ma'am, I have Dr. Fernando Villalta.
- 2 MS. CHERRY: No, after that is Dr. Edwards, and
- 3 then it's Dr. Diane Griffin.
- 4 THE OPERATOR: Okay. I don't have her.
- 5 MS. CHERRY: Well, anyway, we do want Dr.

- 6 Edwards with us, please.
- 7 THE OPERATOR: I do have Dr. Mary Estes, who it
- 8 says do not call. Is she going to be joining this call?
- 9 MS. CHERRY: It was our understanding that she
- 10 would not be joining this call.
- 11 THE OPERATOR: Do you want me to put Kathryn in
- 12 her place, so I don't have to have one more line?
- MS. CHERRY: Yes, please.
- DR. FERRIERI: We're all here, but we --
- 15 PARTICIPANT: Are you still hearing that noise?
- DR. FERRIERI: We're hearing the noise, but we
- 17 lost Dr. Asher.
- MS. CHERRY: No, he's here. He's here.
- DR. FERRIERI: You're here?
- DR. ASHER: I'm still here. I was waiting for
- 21 arrangements for Dr. Edwards to be made.
- DR. ADIMORA: But you had complained about
- 23 background noise. Are you still hearing that, voices?
- DR. FERRIERI: Occasionally, yes, Ada.
- 25 MS. CHERRY: We stopped when the operator broke

- 1 in.
- DR. FERRIERI: Okay. Sorry, Nancy. I'm sorry
- 3 for all these little personal bits that we've exchanged.
- 4 We thought you were out.
- 5 MS. CHERRY: Okay. No, I guess the operator
- 6 didn't have you plugged in when she was talking with us.
- 7 DR. FERRIERI: We can resume then, Dr. Asher.
- 8 Sorry.
- 9 DR. ASHER: Thank you.
- Dr. Taffs recently addressed relevant aspects
- of tests to evaluate removal of spongiform encephalopathy
- 12 agents from production of FDA-regulated products, and he
- will be involved in developing statistically sound
- 14 validation and decision criteria for them.
- Project 5, Improved Potency Testing of
- 16 Inactivated Poliovirus Vaccines by Protection of Transgenic
- 17 Mice Against Challenge, is also led by Dr. Taffs. The WHO

- 18 recently failed to accept any international standard test
- 19 for the potency of IPV. The tests currently used in the
- 20 USA are not ideal. ELISA tests of D antigen do not always
- 21 predict neutralizing antibody responses, and tests of
- 22 immunogenicity for rhesus monkeys require a sensitive
- 23 species and are expensive.
- Dr. Taffs, aware of the shortcomings of
- 25 existing tests, obtained some PVR21 mice from Dr. Nomura

- 1 for IPV testing. His preliminary results suggested that
- 2 mice were protected by IPV against intraperitoneal
- 3 challenge with wild-type 3 poliovirus and that the
- 4 proportion of mice protected depended on the dose,
- 5 schedule, and formulation of the IPV.
- 6 At the time of my arrival at LMD, it was clear

- 7 that IPV would soon replace at least the first two doses of
- 8 OPV for immunizing most children in the USA, and that
- 9 preparations of IPV combined with other vaccines would be
- 10 developed. It seemed an appropriate time for LMD to
- 11 develop improved IPV potency testing, and I encouraged Dr.
- 12 Taffs to resume and complete the study with type 3 IPV and
- 13 to use Tg mice for testing potency of type 1 and type 2
- 14 IPV. Those studies showed that transgenic mice could be
- used to assess potency of each of the three types, and that
- 16 the mouse test appeared to be more predictive of antibody
- 17 response than was D antigen content.
- Furthermore, in addition to confirming that a
- 19 second dose of IPV was needed for reliable immunization,
- 20 with trivalent IPV, several other potentially important
- 21 things were also observed. Monovalent IPV was more
- 22 protective than trivalent IPV containing the same nominal
- 23 human dose, and wild-type-derived IPV was more protective
- 24 than Sabin attenuated virus-derived IPV.
- 25 Those findings suggest that immune response to

- antigens in IPV may be affected by competition among types
- 2 and that IPV prepared from attenuated virus may require a
- 3 formulation different from that in current IPV to achieve
- 4 the same response. Tg mice may provide a model suitable
- 5 for examining immunogenicity of new formulations of IPV and
- 6 of IPV in combined vaccines before clinical trials. The Tg
- 7 mouse protection test may also be useful to compare with
- 8 existing potency tests. We expect to participate in a
- 9 collaborative study with investigators in the Division of
- 10 Viral Products, who are attempting to improve D antigen
- 11 ELISA tests, and from the Rijks Institute in the
- 12 Netherlands, who developed an immunogenicity test for IPV
- 13 in rats.
- Parenthetically, I want to add here that, since
- 15 February, Dr. Taffs, Miss Enterline, and I have been
- 16 conducting a new study in collaboration with Dr. Richard
- 17 Semba at Johns Hopkins and in support of WHO's Extended
- 18 Program on Immunization addressing concerns that oral

- 19 iodine supplementation to the diets of children in EPI
- 20 might interfere with their response to oral poliovirus
- 21 vaccines. Results of the study should be completed within
- a month, and subject identifications will then be decoded.
- Project 6, the last project, Transmissible
- 24 Spongiform Encephalopathies: Assessing the Risk of
- 25 Contaminated Products and Validating Methods to Reduce

- 1 Risk, is a project we began recently in response to
- 2 recognition by FDA of two potential risks to human health
- 3 posed by the agents of the transmissible spongiform
- 4 encephalopathies. One, that Creutzfeldt-Jakob disease may
- 5 be transmitted through biologicals and other materials of
- 6 human origin, and two, that infectious agents causing TSEs
- 7 of animals, like bovine spongiform encephalopathy and

- 8 similar diseases, may accidentally contaminate FDA-
- 9 regulated products and transmit disease to humans. The
- 10 committee was asked to review these plans because they
- 11 represent a new area of research for CBER and for FDA.
- 12 Two projects have been approved and recently
- 13 initiated, both attempting to develop assays validating
- 14 methods purported to remove TSE agents from potentially
- 15 contaminated materials. equipment, and work surfaces. The
- 16 first assay was adapted from a standard test for
- 17 bactericides, modified to use only disposable equipment.
- 18 Rodent-adapted strains of scrapie agent dried onto glass in
- 19 the presence of high organic load are exposed to
- 20 disinfectants and sterilizing regimens. Residual
- 21 infectious agent is then detected by disrupting the
- 22 preparation and injecting material into rodents observed
- 23 for a year or more for evidence of scrapie.
- 24 CBER's Animal Care and Use Committee approved
- 25 the projects contingent on a demonstration that the assay

- l method itself was not unacceptably injurious to the
- 2 animals, and that was successfully completed two weeks ago.
- 3 Preliminary studies, already completed, suggest that none
- 4 of the disinfectant methods currently in use was effective
- 5 in removing all detectable infectivity.
- We recently began a collaborative study with
- 7 investigators in DPQC's Laboratory of Analytical Chemistry
- 8 attempting to confirm reports that PC12 rat
- 9 pheochromocytoma cells infected with the scrapie agent
- 10 undergo marked reduction in GABA-related neurotransmitter
- 11 activity while maintaining normal levels of adrenergic
- 12 activity. Should that pilot study succeed, PC12 cells
- 13 might provide a suitable simplified assay to detect scrapie
- 14 agent as a preliminary screening test for disinfectant and
- 15 sterilization methods. Methods that fail to remove
- 16 infectivity of scrapie agent detectable in cell culture
- 17 would clearly be inadequate for practical use, where
- 18 infecting doses of agent are potentially much higher than
- 19 those detected by cell cultures, and would not merit

- 20 further investigation in rodents.
- Other proposed studies related to TSEs are
- 22 summarized in your notebook. They can be conducted only in
- 23 collaboration with investigators outside the FDA if and
- 24 when additional funding becomes available.
- That concludes my summary of research results

- and goals of the Laboratory of Method Development, and I
- 2 thank you.
- 3 DR. FERRIERI: Thank you, Dr. Asher.
- 4 We now need to clear the room, and Dr. Goldman
- 5 and Mrs. Cherry will see that that takes place, so that the
- 6 only ones who remain are those approved by Dr. Goldman.
- 7 (The open session was recessed, to reconvene
- 8 after the closed session.)

- 9 DR. FERRIERI: I will now ask Mrs. Cherry if we
- 10 have any speakers for the open public hearing.
- 11 MS. CHERRY: The answer is we have no one for
- 12 the open public hearing, so I can return it to you for
- 13 adjournment, after I say thank you to the committee.
- DR. FERRIERI: I want to thank our committee,
- and also, again, the site team and Dr. Griffin. We will be
- seeing each other again as a team in October, I hope.
- MS. CHERRY: We have October 15th and 16th
- 18 reserved on the calendar. In about another week, week and
- 19 a half, we will have our planning meeting, and I will know
- 20 something more as to whether the meeting will take both
- 21 days.
- DR. FERRIERI: Well, I hope that all members of
- 23 the committee will be there. I look forward to seeing all
- 24 of you, and I would like to officially adjourn.
- DR. GOLDMAN: And if I may, I'd like to also

| 1  | extend my thanks and CBER's thanks to Dr. Griffin and her |
|----|---|
| 2  | site visit team, which did an excellent job, and to the   |
| 3  | committee for getting together today.                     |
| 4  | DR. FERRIERI: Thank you, Dr. Goldman.                     |
| 5  | Goodbye, everyone.  |
| 6  | (Whereupon, at 1:52 p.m., the open session was            |
| 7  | adjourned.)   |
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